

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

November 6, 2023

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: *United States v. Jeffrey Parket*
22 Cr. 311 (MKV)**

Dear Judge Vyskocil:

We write with the consent of the government to request leave to file the attached supplement to Mr. Parket's June 14, 2023, sentencing submission. The proposed supplement has the limited purpose of briefly updating the Court concerning Mr. Parket's activities since we filed his principal sentencing submission five months ago.

On June 14, 2023, we filed on Mr. Parket's behalf a sentencing submission in advance of his then-scheduled sentencing date of June 28. ECF No. 65. Two days later, the Court *sua sponte* adjourned Mr. Parket's sentencing to August 30, 2023, in order to resolve certain forfeiture issues before sentencing. ECF No. 67. After setting a briefing schedule on the forfeiture dispute between the government and Mr. Parket's ex-wife, the Court adjourned Mr. Parket's sentencing *sine die* to permit the forfeiture litigation to continue. ECF No. 74. The government and Ms. Parket then resolved their respective interests in the forfeited property, and the Court scheduled Mr. Parket's sentencing for November 16, 2023. ECF Nos. 85, 86. Pursuant to Your Honor's Individual Rules of Practice in Criminal Cases, the government's sentencing submission is due on November 9, 2023.

As described in more detail in the attached proposed supplement, in the time since the filing of our initial submission, Mr. Parket has remained dedicated to pursuing his Securities and Exchange Commission ("SEC") whistleblower cases, which he hopes will result in a substantial recovery that would permit him to

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satisfy his restitution obligations. He has continued to spend countless hours developing these cases in the hopes of compensating his victims, demonstrating his deep remorse. These activities are highly relevant to evaluating his personal history and characteristics. Further, as explained at length in our principal submission, the success of his whistleblower cases depends on Mr. Parket being able to pursue this work, make additional filings, monitor SEC notices, and provide further information to the SEC about his allegations, all of which are activities that he cannot do while incarcerated. *See* ECF No. 65 at 7-9, 12-14. In short, Mr. Parket has worked tirelessly to craft a genuine opportunity to compensate his victims for their substantial losses, a fact that is critical to the appropriate application of several of the Section 3553(a) factors. The attached proposed supplement ensures that the Court has for its consideration the most comprehensive and up-to-date information concerning Mr. Parket's efforts. As noted, the government consents to the filing of a supplemental submission.

Further, the proposed supplemental filing contains confidential information concerning Mr. Parket's whistleblower cases filed with the SEC as well as sensitive information about his mental health treatment and history. Accordingly, we seek permission to file it under seal.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Amy Gallicchio
Amy Gallicchio
Assistant Federal Defender
Federal Defenders of New York
212-417-8728

/s/ Lise Rahdert
Lise Rahdert
Lankler Siffert & Wohl LLP
1185 Avenue of the Americas
New York, NY 10036
(212) 921-8399

Counsel for Jeffrey Parket

Cc: All counsel of record via ECF

ATTACHMENTS FILED UNDER SEAL